

REMARKS

Claims 1, 3 and 7-9 are pending. Claims 1, 3 and 7-9 are rejected. Claim 1 is amended. Support for the amendments and new claims can be found throughout the application, for instance in the specification and claims as originally filed. No new matter is added. Claims 1, 3 and 7-9 are submitted for further consideration at this time. Applicants respectfully request reconsideration and withdrawal of all rejections.

Claim Rejection - 35 U.S.C. § 112

Claims 1, 3 and 7-9 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite. Applicants respectfully submit that the rejection is moot in view of the claim amendments indicated herein, in accordance with the comments at pages 2 and 6-7 of the Office Action. Indeed, the claimed microemulsion consists of water, a fluorinated surfactant and (per)fluoropolyoxyalkylenes. Applicants urge withdrawal of the rejection.

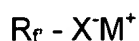
Claim Rejections - 35 U.S.C. § 102/103

Claims 1, 3, 7 and 9 are rejected under 35 U.S.C. 102(b) as being anticipated by Abusleme et al.

Claim 8 is also rejected under 35 U.S.C. 103(a) as being obvious over Abusleme et al in view of Campbell et al.

Applicants respectfully disagree. The present invention as set forth in claim 1 is concerned with a process for the synthesis of chlorotrifluoroethylene (PCTFE) (co)polymers, containing at least 80% by moles of CTFE, the complement to 100 being one or more fluorinated monomers in aqueous emulsion, in the presence of a

microemulsion consisting of water, (per)fluoropolyoxyalkylenes and fluorinated surfactant, and an inorganic initiator, wherein the fluorinated surfactant has formula:



wherein R_F is a C_5 - C_{14} (per)fluoroalkyl chain, or a (per)fluoropolyoxyalkylene chain, X^- is $-COO^-$ or $-SO_3^-$, M^+ is Na^+ or K^+ , and the initiator is a potassium and/or sodium persulphate, wherein temperature is in the range of $0^\circ C$ - $150^\circ C$ and pressure is in the range of 3 - 80 bar.

Applicants urge that no such invention as claimed is taught or suggested by any combination of the cited references. Indeed, Applicants urge that the above rejections are moot in view of the claim amendments indicated herein, in accordance with the suggestion at page 6 of the Office Action. It is further pointed out that Campbell et al. is unable to cure the deficiencies of Abusleme et al., and it should be noted that the disclosure of Campbell et al. concerns only telomers of CTFE and not polymers of CTFE.

Nevertheless, Applicants would like to point out that the claimed process employs a microemulsion of (per)fluoropolyoxyalkylenes that do not contain H atoms, that is, fully fluorinated fluoropolyoxyalkylenes, that are clearly distinguished from the fluoropolyoxyalkylenes containing H atoms in an end group and/or chain as used in the microemulsions of Abusleme et al.

In addition, Applicants would like to point out that the allegation at page 6 of the Office Action, that the microemulsions of Abusleme et al. (col. 4, lines 30-34) comprise not only fluoropolyoxyalkylenes but also (per)fluoropolyoxyalkylenes, is incorrect. In fact, Abusleme et al. at col. 4, lines 30-34 refers to non ionic fluorinated surfactants containing fluorinated or perfluorinated polyoxyalkylene chains and not the fluorinated oil of the microemulsion.

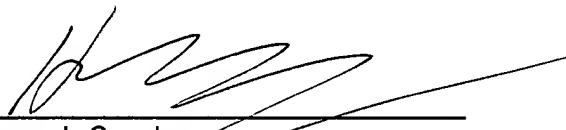
Finally, Applicants note that the microemulsions of Abusleme et al. could not comprise (per)fluoropolyoxyalkylenes since such fluorinated compounds are disclosed as negatively effecting rates of polymerization. See col. 1, lines 30-55 and comparative examples of Abusleme et al.

Therefore, in that no combination of the cited references is able to teach or suggest each and every element of the claimed invention, Applicants urge withdrawal of all rejections.

In view of the amendments and remarks above, Applicants submit that this application is in condition for allowance and request favorable action thereon.

In the event this paper is not timely filed, Applicants hereby petition for an appropriate extension of time. The fee for this extension may be charged to our Deposit Account No. 01-2300, along with any other additional fees which may be required with respect to this paper referencing Attorney Docket No. 108910-00011.

Respectfully submitted,



Hans J. Crosby
Registration No. 44,634

Customer No. 004372
ARENT FOX KINTNER PLOTKIN & KAHN, PLLC
1050 Connecticut Avenue, N.W.,
Suite 400
Washington, D.C. 20036-5339
Tel: (202) 857-6000
Fax: (202) 638-4810

HJC/ccd